

UNITED STATES DISTRICT COURT
for the
Southern District of Texas
Civil Division

United States Courts
Southern District of Texas
FILED

APR 14 2020

David J. Bradley, Clerk of Court

Case No.

Berrick Berrail Turner
Plaintiff

- v -

Harris County, Texas
Defendant

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

In the wake of the pandemic novel corona-virus I feel that my life is in imminent danger due to not being able to make bail. Due to cramped conditions, under resourced medical care, unsanitary conditions, and it's impossible to enforce social distancing to prevent the spread of it. It's already spreading like wildfire among the jail population as well as the staff and there shouldn't be any needless suffering if there doesn't have to be. I don't want to die in jail due to not being able to make bond. The coronavirus doesn't have specific category of people that it chooses to infect.

I. The Parties to this Complaint

A. The Plaintiff

Berrick Berrail Turner

SP# 02557585

1200 Baker ^{St.} 2 B1

Houston, TX 77002

B. The Defendants

Defendant No. 1

179th District Court Harris County, TX

201 Caroline ^{St.}

Houston, TX 77002

☐ Individual Capacity ☒ Official Capacity

Defendant No. 2

Harris County Probation [&] Supervision

79 N. San Jacinto

Houston, TX 77002

☐ Individual Capacity ☒ Official Capacity

II. Basis for Jurisdiction

A. Are you bringing suit against

☐ Federal Officials

☒ state or local officials

B. Right to life, 8th Amendment, cruel and unusual Punishment

III. Prisoner status

☒ Pretrial detainee

IV. statement of Claim

A. In the Harris County Sheriff's Office 1200 Baker St. Houston, TX. around March 10, 2020 there was an outbreak of the deadly coronavirus among staff and inmates. Harris County is involved by setting a bond too high for me to afford.

B. Everything happened around March 10, 2020 if I'm not mistaking.

V. Injuries

none

VI. Relief

Immediate Relief, temporary Restraining Order,
Preliminary Injunctive Relief

VII. Exhaustion of Administrative Remedies Procedure

A. ☒ yes

Harris County Sheriff's Office

B. ☒ yesC. ☒ Do not knowD. ☒ yes

E.

1. Kiosk

2. Imminent threat of the coronavirus

3. Denied

4. Talk to the sergeant

F.

1. I filed one

2. Medical Personell at bridge and I was
placed in medical isolation giving a nose swab
which came back negative.

VIII. Previous Lawsuits

☒ NO

A.

☒ NO

C.

☒ NO

IX.

Certification and closing

A. For Parties Without An Attorney

Date of signing April 8, 2020

Dorvil A. Turner

Derrick S. Turner

SPIN # 02557585

1200 Baker St. 2B1 MHU

Houston, TX 77002

UNITED STATES DISTRICT COURT

Southern District ^{for the} of TexasDerrick S. Turner
Plaintiff

v.

Harris County, Texas

Defendant / Respondent

Application To Proceed In District Court
Without Prepaying Fees Or Costs

I am a plaintiff or petitioner in this case and declare that I am unable to pay the costs of these proceedings and that I am entitled to the relief requested.

In support of this application, I answer the following questions under penalty of perjury:

- c. I am being held at: Harris County Sheriff's Office 1200 Baker St Houston, TX 77002
Cell 2B1